



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

FEB 11 2014

REPLY TO THE ATTENTION OF:

Ms. Mary Ann Dolehanty
Permit Section Supervisor
Michigan Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909-7760

Dear Ms. Dolehanty:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft construction permit for General Motors LLC. (Permit number 122-13). Below is our comment:

- 1) On Page 33 of the draft permit for source wide conditions FG-FACILITY contains general limits to restrict Hazardous Air Pollutants (HAP) to below 10 tons per year for an individual HAP and 25 tons per year for aggregate HAPs. As stated in Rule 205, as well as Federal guidance such as the June 13, 1989 EPA memo entitled, "Guidance on Limiting Potential to Emit (PTE) in New Source Permitting," practically enforceable PTE limits typically include production and/or operation limits. Emission limits alone are generally not practically enforceable for the purpose of limiting PTE unless there is a continuous emissions monitoring system, or in certain cases where emissions can be accurately determined, for example, via mass balance calculations. MDEQ should address in the Staff Report whether these emission limits reflect maximum emissions and production capacity, and also whether any are intended to limit PTE. For PTE limits, MDEQ should also address how the permit conditions ensure that the limits are enforceable as a practical matter. We understand that any practical enforceability considerations may also require revisions to the underlying Permit to Install. Additionally, the 2.1 tons per month aggregate HAP limit (condition 1.3) can result in the aggregate HAP emissions exceeding 25 tons per year in between a given calendar month.

We would like to thank you again for working with us in making sure that these issues were resolved in a timely manner. If you have any further questions, please feel free to contact Constantine Blathras, of my staff, at (312) 886-0671.

Sincerely,

Genevieve Damico
Chief
Air Permits Section